

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1 and JANE DOE 2, on behalf of
themselves and all similarly situated women,

Plaintiffs,

-against-

THE CITY OF NEW YORK and BENNY
SANTIAGO,

Defendants.

15 Civ. 3849 (AKH)

**NOTICE OF PLAINTIFFS' MOTION IN LIMINE TO EXCLUDE THE EXPERT
REPORT AND PROPOSED TRIAL TESTIMONY OF THERESA LANTZ**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law
and the Declaration of Joseph Kay, dated April 17, 2017, plaintiffs Jane Doe 1 and Jane Doe 2
("Plaintiffs") hereby move this Court, at a date and time to be determined by the Court, for an
order excluding the expert report and proposed trial testimony of defendant the City of New
York's (the "City") corrections expert Theresa Lantz; and

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's orders,
opposition papers are due on April 24, 2017.

Plaintiffs submit the following exhibits to the Kay Declaration:

Exhibit 1	Expert Report of Timothy P. Ryan, dated November 3, 2016
Exhibit 2	Excerpted transcript of the deposition of Theresa Lantz on February 8, 2017
Exhibit 3	Expert Report of Theresa Lantz, dated December 9, 2016
Exhibit 4	Sexual Safety Assessment Report: New York City Department of Correction, by The Moss Group, Inc., dated June 2015, Bates-stamped DEF_0014410-95

Dated: New York, New York
April 17, 2017

Respectfully submitted,

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